UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

HENRY TUCKER, on behalf of himself and all others similarly situated,

Civil Action No. 1:18-cv-11963-DAB

Plaintiffs,

v.

STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO COMPLAINT

HELLY NAHMAD GALLERY INC.,

Defendant.

USDC SDNY DOCUMENT ELECTRONICALLY FILED

DOC #:

DATE FILED: <u>7/3/19</u>

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned

attorneys for the parties that the time within which defendant, HELLY NAHMAD GALLERY

GRANTED. /s/ DAB 7/3/19

INC., may move, answer, or otherwise respond to the Complaint is hereby extended for 30 days from July 3, 2019 up to and including August 2, 2019.

No provision of this Stipulation and Order shall be construed as a waiver of, and Defendant HELLY NAHMAD GALLERY INC., expressly reserves, any and all defenses.

This is the second request for an extension of time in connection with this matter and is necessary due to the parties actively negotiating toward a potential settlement.

Dated: July 1, 2019

July 1, 2019 Dated:

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SO ORDERED:

7/3/19

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NAHMAD GALLERY INC.

Deborah A. Batts United States District Judge